

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

U.S. SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

VLADISLAV KLIUSHIN (a/k/a
VLADISLAV KLYUSHIN), *et al.*,

Defendants.

Case No. 1:21-cv-12088-WGY

JOINT REPORT RESPONDING TO MAY 14, 2024 ORDER

Pursuant to the Court’s May 14, 2024 Order (Dkt. No. 59), Plaintiff U.S. Securities and Exchange Commission (“SEC”) and Defendant Vladislav Kliushin, a/k/a Vladislav Klyushin (“Kliushin”) respectfully submit this joint report to address “whether this civil action ought [sic] be stayed pending resolution of the criminal matter styled United States v. Klyushin [*United States v. Klyushin, et al.*, No. 21-cr-10104-PBS (D. Mass) (“Criminal Action”)].”

Defendant’s position is that a stay of this case pending resolution of the Criminal Action is appropriate. The SEC’s position is that, while a pending appeal does not undermine the validity, finality, and preclusive effect of the judgment in the Criminal Action for purposes of collateral estoppel, in light of the Court’s Order and the facts and circumstances of this case, the SEC does not oppose staying this case pending resolution of the appeal in the Criminal Action.

Dated: May 20, 2024

Respectfully submitted,

/s/ Jennifer L. Farer

James P. Connor

Jennifer L. Farer

U.S. SECURITIES AND EXCHANGE COMMISSION

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CERTIFICATE OF SERVICE

I, Jennifer L. Farer, certify that on May 20, 2024, the foregoing was filed using the Court's CM/ECF system, which constitutes service upon all registered ECF users. In addition, copies of the foregoing were sent to the following Defendants at the following email addresses:

Defendant	Email Address
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/s/ Jennifer L. Farer
JENNIFER L. FARER